

EXHIBIT E

[Welch Declaration w/Exs. (5 Pages)]

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

14 IN RE: HIGH-TECH EMPLOYEE
15 ANTITRUST LITIGATION
16 THIS DOCUMENT RELATES TO
17 ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF SUSAN J. WELCH IN
SUPPORT OF DEFENDANTS' MOTION TO
STRIKE THE REPORT OF DR. EDWARD
E. LEAMER**

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Master Docket No. 11-CV-2509-LHK

DECLARATION OF SUSAN J. WELCH IN SUPPORT OF MOTION TO STRIKE

1 I, Susan J. Welch, declare:

2 1. I am an attorney duly licensed to practice law in the State of California, and a
3 counsel at the firm of Bingham McCutchen LLP, attorneys for Defendant Intel Corporation
4 (“Intel”). I make this declaration based on my own personal knowledge. If called upon to
5 testify, I could and would testify competently to the truth of the matters stated herein.

6 2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the
7 deposition transcript of plaintiffs’ expert Edward Leamer, taken on October 26, 2012 in this
8 matter.

9 3. Attached hereto as Exhibit B is a true and correct copy of excerpts from the
10 deposition transcript of plaintiff Mark Fichtner, taken on October 15, 2012 in this matter.

11 4. Attached hereto as Exhibit C is a true and correct copy of excerpts from the
12 deposition transcript of plaintiff Michael Devine, taken on October 24, 2012 in this matter.

13 5. Attached hereto as Exhibit D is a true and correct copy of excerpts from the
14 deposition transcript of plaintiff Siddarth Hariharan, taken on October 12, 2012 in this matter.

15 6. Attached hereto as Exhibit E is a true and correct copy of excerpts from the
16 deposition transcript of plaintiff Brandon Marshall, taken on October 22, 2012 in this matter.

17 7. Attached hereto as Exhibit F is a true and correct copy of excerpts from the
18 deposition transcript of plaintiff Daniel Stover, taken on October 29, 2012 in this matter.

19 8. Attached hereto as Exhibit G is a true and correct copy of an article by Dr.
20 Leamer published in the American Economics Review, titled *Let’s Take the Con Out of
21 Econometrics*.

22 9. Attached hereto as Exhibit H is a true and correct copy of an article by Dr.
23 Leamer published in the Journal of Economic Perspectives, titled *Tantalus on the Road to
24 Asymptopia*.

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed
2 this 12th day of November in San Francisco, California.
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5 By: _____ /s/ Susan J. Welch
6 Susan J. Welch
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10 **ATTESTATION:** Pursuant to General Order 45, Part X-B, the filer attests that concurrence in
11 the filing of this document has been obtained from all signatories.
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10 _____ /s/ Frank M. Hinman
11 Frank M. Hinman
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Exhibits A through F filed under seal